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7   8   9   10   11   12   13   14   15	Tony West Assistant Attorney General Melinda L. Haag United States Attorney R. Michael Underhill Attorney in Charge, West Coast Office Torts Branch, Civil Division R. Scott Blaze Senior Admiralty Counsel Torts Branch, Civil Division U.S. Department of Justice P.O. Box 36028 450 Golden Gate Avenue, Room 7-5395 San Francisco, CA 94102-3463 Attorneys for Defendant United States of America	
16 17	LINITED STATES	DISTRICT COURT
	UNITED STATES DISTRICT COURT  NORTHERN DISTRICT OF CALIFORNIA	
18 19	NORTHERN DISTRI	CI OF CALIFORNIA
20	DONNA DELOISE MOORE,	) CASE NO. CV 10-2193 SC
21	Plaintiff,	) AMENDED STIPULATION AND
22	VS.	<ul><li>PROPOSED ORDER RE EXPERT</li><li>DISCLOSURES AND REPORTS</li></ul>
23   24   25	THE UNITED STATES OF AMERICA, in personam, CAPE HORN, its engines, tackle, apparel, furniture, etc., in rem	
26   27   28	DONNA DELOISE MOORE ("Plain	tiff") and THE UNITED STATES OF

Stipulation and Proposed Order Re Expert Disclosures and Reports Case No. CV10-2193 SC

1	AMERICA ("Defendant") jointly submit this Stipulation and Proposed Order	
2	Regarding Expert Disclosures and Reports as follows:	
3	WHEREAS in its STATUS CONFERENCE ORDER of January 7, 2011, the	
4	Court set this mater for a bench trial on September 6, 2011; and	
5	WHEREAS the Court did not set dates for expert disclosures or the exchange of	
6	expert reports in its January 7, 2011 Order; and	
7	WHEREAS the parties want an exchange date approved by the Court; and	
8	WHEREAS the parties want to await the completion of discovery prior to the	
9	first disclosure of expert information and reports by the Plaintiff;	
10	WHEREFORE The parties HEREBY STIPULATE and request that the Court	
11	order that expert disclosures and reports be exchanged by the parties as follows:	
12	By Plaintiff: July 15, 2011	
13	By Defendant: August 5, 2011.	
14		
15	DATED: July 1, 2011 BRODSKY MICKLOW BULL & WEISS LLP	
16	By: /S/ Edward M. Bull III	
17	By: <u>/S/ Edward M. Bull III</u> Edward M. Bull III	
18	Attorneys for Plaintiff Donna Deloise Moore	
19		
20		
21	DATED: July 1, 2011  U.S. Department of Justice Torts Branch, Civil Division	
22		
23	By: <u>/S/ R. Scott Blaze</u> R. Michael Underhill	
24	R. Scott Blaze	
25	Attorneys for Defendant United States of America	
26		
27		
28		

1 [PROPOSED] 2 **ORDER** 3 Having considered the stipulation of counsel, and good cause appearing in 4 support of their request, IT IS HEREBY ORDERED THAT expert disclosures and 5 reports be exchanged by the parties as follows: By Plaintiff: July 15, 2011. 7 By Defendant: August 5, 2011. 8 9 7/5/11 DATED: HON. S 11 UNITED **JUDGE** 12 13 14 15 **CERTIFICATE OF SIGNATURE** 16 I attest that the content of this document is acceptable to attorney, R. Scott 17 Blaze, and that he authorized me to sign the document on his behalf. 18 19 /s/ Edward M. Bull III 20 21 22 23 24 25 26 27 28